

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
TABATHA FOSTER

Plaintiff,

**ANSWER**

-against-

THE CITY OF NEW YORK; RAYMOND W. KELLY, as  
Former Police Commissioner, Police Department City of New  
York; WILLIAM J. BRATTON, as Former Police  
Commissioner, Police Department of New York; JAMES P.  
O'NEILL, as Police Commissioner, Police Department City of  
New York and JEFFREY B. MADDREY, as assistant Chief,  
Patrol Borough Brooklyn North, Police Department City of  
New York sued individually and in their official capacities as  
employees of defendant THE CITY OF NEW YORK

Case No. 16 cv 6859

Defendants.

-----X

**ANSWER TO VERIFIED COMPLAINT**

Defendant JEFFREY B. MADDREY, by and through their undersigned counsel, as and  
for their Verified Answer to Plaintiff's Verified Complaint ("Complaint"), respectfully alleges as  
follows:

**AS TO JURISDICTION AND VENUE**

1. Defendant denies the allegations of the First paragraph of the Complaint.
2. Defendant denies the allegations of the Second paragraph of the Complaint.

**AS TO PROCEDURAL REQUIREMENTS**

3. Defendant denies knowledge or information sufficient to form a belief as to the  
truth or falsity of the allegations of the Third paragraph of the Complaint.
4. Defendant denies the allegations of the Fourth paragraph of the Complaint.

**AS TO PLAINTIFF**

5. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Fifth paragraph of the Complaint.

**AS TO DEFENDANTS'**

6. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Sixth paragraph of the Complaint.

7. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Seventh paragraph of the Complaint.

8. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Eighth paragraph of the Complaint.

9. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Ninth paragraph of the Complaint.

10. Defendant denies the allegations of the Tenth paragraph of the Complaint except admits that JEFFREY B. MADDREY, is an Assistant Chief with the New York Police Department.

**AS TO BACKGROUND**

11. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Eleventh paragraph of the Complaint.

12. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twelfth paragraph of the Complaint.

13. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Thirteenth paragraph of the Complaint.

14. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Fourteenth paragraph of the Complaint.

15. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Fifteenth paragraph of the Complaint.

16. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Sixteenth paragraph of the Complaint.

17. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Seventeenth paragraph of the Complaint.

18. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Eighteenth paragraph of the Complaint.

19. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Nineteenth paragraph of the Complaint.

20. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twentieth paragraph of the Complaint.

21. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twenty-First paragraph of the Complaint.

22. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twenty-Second paragraph of the Complaint.

23. Defendant denies the allegations of the Twenty-Third paragraph of the Complaint.

24. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twenty-Fourth paragraph of the Complaint.

25. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twenty-Fifth paragraph of the Complaint.

26. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Twenty-Sixth paragraph of the Complaint.

27. Defendant denies the allegations of the Twenty-Seventh paragraph of the Complaint.

28. Defendant denies the allegations of the Twenty-Eighth paragraph of the Complaint.

29. Defendant denies the allegations of the Twenty-Ninth paragraph of the Complaint

30. Defendant denies the allegations of the Thirtieth paragraph of the Complaint.

31. Defendant denies the allegations of the Thirty-First paragraph of the Complaint.

32. Defendant denies the allegations of the Thirty-Second paragraph of the Complaint.

33. Defendant denies the allegations of the Thirty-Third paragraph of the Complaint.

34. Defendant denies the allegations of the Thirty-Fourth paragraph of the Complaint.

35. Defendant denies the allegations of the Thirty-Fifth paragraph of the Complaint.

36. Defendant denies the allegations of the Thirty-Sixth paragraph of the Complaint.

37. Defendant denies the allegations of the Thirty-Seventh paragraph of the Complaint.

38. Defendant denies the allegations of the Thirty-Eighth paragraph of the Complaint.

39. Defendant denies the allegations of the Thirty-Ninth paragraph of the Complaint.

40. Defendant denies the allegations of the Fortieth paragraph of the Complaint.

41. Defendant denies the allegations of the Forty-First paragraph of the Complaint.

42. Defendant denies the allegations of the Forty-Second paragraph of the Complaint.

43. Defendant denies the allegations of the Forty-Third paragraph of the Complaint.



44. Defendant denies the allegations of the Forty-Fourth paragraph of the Complaint.
45. Defendant denies the allegations of the Forty-Fifth paragraph of the Complaint.
46. Defendant denies the allegations of the Forty-Sixth paragraph of the Complaint.
47. Defendant denies the allegations of the Forty-Seventh paragraph of the Complaint.
48. Defendant denies the allegations of the Forty-Eighth paragraph of the Complaint.
49. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Forty-Ninth paragraph of the Complaint.
50. Defendant denies the allegations of the Fiftieth paragraph of the Complaint.
51. Defendant denies the allegations of the Fifty-First paragraph of the Complaint.
52. Defendant denies the allegations of the Fifty-Second paragraph of the Complaint.
53. Defendant denies the allegations of the Fifty-Third paragraph of the Complaint.
54. Defendant denies the allegations of the Fifty-Fourth paragraph of the Complaint.
55. Defendant denies the allegations of the Fifty-Fifth paragraph of the Complaint.
56. Defendant denies the allegations of the Fifty-Sixth paragraph of the Complaint.
57. Defendant denies the allegations of the Fifty-Seventh paragraph of the Complaint.
58. Defendant denies the allegations of the Fifty-Eighth paragraph of the Complaint.
59. Defendant denies the allegations of the Fifty-Ninth paragraph of the Complaint.
60. Defendant denies the allegations of the Sixtieth paragraph of the Complaint.
61. Defendant denies the allegations of the Sixty-First paragraph of the Complaint.
62. Defendant denies the allegations of the Sixty-Second paragraph of the Complaint.
63. Defendant denies the allegations of the Sixty-Third paragraph of the Complaint.
64. Defendant denies the allegations of the Sixty-Fourth paragraph of the Complaint.

65. Defendant denies the allegations of the Sixty-Fifth paragraph of the Complaint.

66. Defendant denies the allegations of the Sixty-Sixth paragraph of the Complaint.

67. Defendant denies the allegations of the Sixty-Seventh paragraph of the Complaint.

68. Defendant denies the allegations of the Sixty-Eighth paragraph of the Complaint.

69. Defendant denies the allegations of the Sixty-Ninth paragraph of the Complaint.

70. Defendant denies the allegations of the Seventieth paragraph of the Complaint.

71. Defendant denies the allegations of the Seventy-First paragraph of the Complaint.

72. Defendant denies the allegations of the Seventy-Second paragraph of the Complaint.

73. Defendant denies the allegations of the Seventy-Third paragraph of the Complaint.

74. Defendant denies the allegations of the Seventy-Fourth paragraph of the Complaint.

75. Defendant denies the allegations of the Seventy-Fifth paragraph of the Complaint.

76. Defendant denies the allegations of the Seventy-Sixth paragraph of the Complaint.

77. Defendant denies the allegations of the Seventy-Seventh paragraph of the Complaint.

78. Defendant denies the allegations of the Seventy-Eighth paragraph of the Complaint.

79. Defendant denies the allegations of the Seventy-Ninth paragraph of the Complaint.

80. Defendant denies the allegations of the Eightieth paragraph of the Complaint.

81. Defendant denies the allegations of the Eighty-First paragraph of the Complaint.

82. Defendant denies the allegations of the Eighty-Second paragraph of the Complaint.

83. Defendant denies the allegations of the Eighty-Third paragraph of the Complaint.

84. Defendant denies the allegations of the Eighty-Fourth paragraph of the Complaint.

85. Defendant denies the allegations of the Eighty-Fifth paragraph of the Complaint.

86. Defendant denies the allegations of the Eighty-Sixth paragraph of the Complaint.

87. Defendant denies the allegations of the Eighty-Seventh paragraph of the Complaint.

88. Defendant denies the allegations of the Eighty-Eighth paragraph of the Complaint.

89. Defendant denies the allegations of the Eighty-Ninth paragraph of the Complaint.

90. Defendant denies the allegations of the Ninetieth paragraph of the Complaint.

91. Defendant denies the allegations of the Ninety-First paragraph of the Complaint.

92. Defendant denies the allegations of the Ninety-Second paragraph of the Complaint.

93. Defendant denies the allegations of the Ninety-Third paragraph of the Complaint.

94. Defendant denies the allegations of the Ninety-Fourth paragraph of the Complaint.

95. Defendant denies the allegations of the Ninety-Fifth paragraph of the Complaint.

96. Defendant denies the allegations of the Ninety-Sixth paragraph of the Complaint.

97. Defendant denies the allegations of the Ninety-Seventh paragraph of the Complaint.

98. Defendant denies the allegations of the Ninety-Eighth paragraph of the Complaint.

99. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the Ninety-Ninth paragraph of the Complaint.

100. Defendant denies the allegations of paragraph One Hundred of the Complaint.

101. Defendant denies the allegations of paragraph One Hundred and One of the Complaint.

102. Defendant denies the allegations of paragraph One Hundred and Two of the Complaint.

103. Defendant denies the allegations of paragraph One Hundred and Three of the Complaint.

104. Defendant denies the allegations of paragraph One Hundred and Four of the Complaint.

105. Defendant denies the allegations of paragraph One Hundred and Five of the Complaint.

106. Defendant denies the allegations of paragraph One Hundred and Six of the Complaint.

107. Defendant denies the allegations of paragraph One Hundred and Seven of the Complaint.

108. Defendant denies the allegations of paragraph One Hundred and Eight of the Complaint.



109. Defendant denies the allegations of paragraph One Hundred and Nine of the Complaint.

110. Defendant denies the allegations of paragraph One Hundred and Ten of the Complaint.

111. Defendant denies the allegations of paragraph One Hundred and Eleven of the Complaint.

112. Defendant denies the allegations of paragraph One Hundred and Twelve of the Complaint.

113. Defendant denies the allegations of paragraph One Hundred and Thirteen of the Complaint.

114. Defendant denies the allegations of paragraph One Hundred and Fourteen of the Complaint.

115. Defendant denies the allegations of paragraph One Hundred and Fifteen of the Complaint.

116. Defendant denies the allegations of paragraph One Hundred and Sixteen of the Complaint.

117. Defendant denies the allegations of paragraph One Hundred and Seventeen of the Complaint.

118. Defendant denies the allegations of paragraph One Hundred and Eighteen of the Complaint.

119. Defendant denies the allegations of paragraph One Hundred and Nineteen of the Complaint.

120. Defendant denies the allegations of paragraph One Hundred and Twenty of the Complaint.

121. Defendant denies the allegations of paragraph One Hundred Twenty-One and of the Complaint.

122. Defendant denies the allegations of paragraph One Hundred and Twenty-Two of the Complaint.

123. Defendant denies the allegations of paragraph One Hundred and Twenty-Three of the Complaint.

124. Defendant denies the allegations of paragraph One Hundred and Twenty-Four of the Complaint.

125. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph One Hundred and Twenty-Five of the Complaint.

126. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph One Hundred and Twenty-Six of the Complaint.

127. Defendant denies the allegations of paragraph One Hundred and Twenty-Seven of the Complaint.

128. Defendant denies the allegations of paragraph One Hundred and Twenty-Eight of the Complaint.

129. Defendant denies the allegations of paragraph One Hundred and Twenty-Nine of the Complaint.

130. Defendant denies the allegations of paragraph One Hundred and Thirty-of the Complaint.

131. Defendant denies the allegations of paragraph One Hundred and Thirty-One of the Complaint.

132. Defendant denies the allegations of paragraph One Hundred and Thirty-Two of the Complaint.

133. Defendant denies the allegations of paragraph One Hundred and Thirty-Three of the Complaint.

134. Defendant denies the allegations of paragraph One Hundred and Thirty-Four of the Complaint.

135. Defendant denies the allegations of paragraph One Hundred and Thirty-Five of the Complaint.

136. Defendant denies the allegations of paragraph One Hundred and Thirty-Six of the Complaint.

137. Defendant denies the allegations of paragraph One Hundred and Thirty-Seven of the Complaint.

138. Defendant denies the allegations of paragraph One Hundred and Thirty-Eight of the Complaint.

139. Defendant denies the allegations of paragraph One Hundred and Thirty-Nine of the Complaint.

140. Defendant denies the allegations of paragraph One Hundred and Forty of the Complaint.

141. Defendant denies the allegations of paragraph One Hundred and Forty-One of the Complaint.

142. Defendant denies the allegations of paragraph One Hundred and Forty-Two of the Complaint.

143. Defendant denies the allegations of paragraph One Hundred and Forty-Three of the Complaint.

144. Defendant denies the allegations of paragraph One Hundred and Forty-Four of the Complaint.

145. Defendant denies the allegations of paragraph One Hundred and Forty-Five of the Complaint.

146. Defendant denies the allegations of paragraph One Hundred and Forty-Six of the Complaint.

147. Defendant denies the allegations of paragraph One Hundred and Forty-Seven of the Complaint.

148. Defendant denies the allegations of paragraph One Hundred and Forty-Eight of the Complaint.

149. Defendant denies the allegations of paragraph One Hundred and Forty-Nine of the Complaint.

150. Defendant denies the allegations of paragraph One Hundred and Fifty of the Complaint.

151. Defendant denies the allegations of paragraph One Hundred and Fifty-One of the Complaint.

152. Defendant denies the allegations of paragraph One Hundred and Fifty-Two of the Complaint.



153. Defendant denies the allegations of paragraph One Hundred and Fifty-Three of the Complaint.

154. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph One Hundred and Fifty-Four of the Complaint.

155. Defendant denies the allegations of paragraph One Hundred and Fifty-Five of the Complaint.

156. Defendant denies the allegations of paragraph One Hundred and Fifty-Six of the Complaint.

157. Defendant denies the allegations of paragraph One Hundred and Fifty-Seven of the Complaint.

158. Defendant denies the allegations of paragraph One Hundred and Fifty-Eight of the Complaint.

159. Defendant denies the allegations of paragraph One Hundred and Fifty-Nine of the Complaint.

160. Defendant denies the allegations of paragraph One Hundred and Sixty of the Complaint.

161. Defendant denies the allegations of paragraph One Hundred and Sixty-One of the Complaint.

162. Defendant denies the allegations of paragraph One Hundred and Sixty-Two of the Complaint.

163. Defendant denies the allegations of paragraph One Hundred and Sixty-Three of the Complaint.

164. Defendant denies the allegations of paragraph One Hundred and Sixty-Four of the Complaint.

165. Defendant denies the allegations of paragraph One Hundred and Sixty-Five of the Complaint.

166. Defendant denies the allegations of paragraph One Hundred and Sixty-Six of the Complaint.

167. Defendant denies the allegations of paragraph One Hundred and Sixty-Seven of the Complaint.

168. Defendant denies the allegations of paragraph One Hundred and Sixty-Eight of the Complaint.

169. Defendant denies the allegations of paragraph One Hundred and Sixty-Nine of the Complaint.

170. Defendant denies the allegations of paragraph One Hundred and Seventy of the Complaint.

171. Defendant denies the allegations of paragraph One Hundred and Seventy-One of the Complaint.

172. Defendant denies the allegations of paragraph One Hundred and Seventy-Two of the Complaint.

173. Defendant denies the allegations of paragraph One Hundred and Seventy-Three of the Complaint.

174. Defendant denies the allegations of paragraph One Hundred and Seventy-Four of the Complaint.

175. Defendant denies the allegations of paragraph One Hundred and Seventy-Five of the Complaint.

176. Defendant denies the allegations of paragraph One Hundred and Seventy-Six of the Complaint.

177. Defendant denies the allegations of paragraph One Hundred and Seventy-Seven of the Complaint.

178. Defendant denies the allegations of paragraph One Hundred and Seventy-Eight of the Complaint.

179. Defendant denies the allegations of paragraph One Hundred and Seventy-Nine of the Complaint.

180. Defendant denies the allegations of paragraph One Hundred and Eighty of the Complaint.

181. Defendant denies the allegations of paragraph One Hundred and Eighty-One of the Complaint.

182. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph One Hundred and Eighty-Two of the Complaint.

183. Defendant denies the allegations of paragraph One Hundred and Eighty-Three of the Complaint.

184. Defendant denies the allegations of paragraph One Hundred and Eighty-Four of the Complaint.

185. Defendant denies the allegations of paragraph One Hundred and Eighty-Five of the Complaint.

186. Defendant denies the allegations of paragraph One Hundred and Eighty-Six of the Complaint.

187. Defendant denies the allegations of paragraph One Hundred and Eighty-Seven of the Complaint.

188. Defendant denies the allegations of paragraph One Hundred and Eighty-Eight of the Complaint.

189. Defendant denies the allegations of paragraph One Hundred and Eighty-Nine of the Complaint.

190. Defendant denies the allegations of paragraph One Hundred and Ninety of the Complaint.

191. Defendant denies the allegations of paragraph One Hundred and Ninety-One of the Complaint.

192. Defendant denies the allegations of paragraph One Hundred and Ninety-Two of the Complaint.

193. Defendant denies the allegations of paragraph One Hundred and Ninety-Three of the Complaint.

194. Defendant denies the allegations of paragraph One Hundred and Ninety-Four of the Complaint.

195. Defendant denies the allegations of paragraph One Hundred and Ninety-Five of the Complaint.

196. Defendant denies the allegations of paragraph One Hundred and Ninety-Six of the Complaint.



197. Defendant denies the allegations of paragraph One Hundred and Ninety-Seven of the Complaint.

198. Defendant denies the allegations of paragraph One Hundred and Ninety-Eight of the Complaint.

199. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph One Hundred and Ninety-Nine of the Complaint.

200. Defendant denies the allegations of paragraph Two Hundred of the Complaint.

201. Defendant denies the allegations of paragraph Two Hundred and One of the Complaint.

202. Defendant denies the allegations of paragraph Two Hundred and Two of the Complaint.

203. Defendant denies the allegations of paragraph Two Hundred and Three of the Complaint.

204. Defendant denies the allegations of paragraph Two Hundred and Four of the Complaint.

205. Defendant denies the allegations of paragraph Two Hundred and Five of the Complaint.

206. Defendant denies the allegations of paragraph Two Hundred and Six of the Complaint.

207. Defendant denies the allegations of paragraph Two Hundred and Seven of the Complaint.

208. Defendant denies the allegations of paragraph Two Hundred and Eight of the Complaint.

209. Defendant denies the allegations of paragraph Two Hundred and Nine of the Complaint.

210. Defendant denies the allegations of paragraph Two Hundred and Ten of the Complaint.

211. Defendant denies the allegations of paragraph Two Hundred and Eleven of the Complaint.

212. Defendant denies the allegations of paragraph Two Hundred and Twelve of the Complaint.

213. Defendant denies the allegations of paragraph Two Hundred and Thirteen of the Complaint.

214. Defendant denies the allegations of paragraph Two Hundred and Fourteen of the Complaint.

215. Defendant denies the allegations of paragraph Two Hundred and Fifteen of the Complaint.

216. Defendant denies the allegations of paragraph Two Hundred and Sixteen of the Complaint.

217. Defendant denies the allegations of paragraph Two Hundred and Seventeen of the Complaint.

218. Defendant denies the allegations of paragraph Two Hundred and Eighteen of the Complaint.

219. Defendant denies the allegations of paragraph Two Hundred and Nineteen of the Complaint.

220. Defendant denies the allegations of paragraph Two Hundred and Twenty of the Complaint.

221. Defendant denies the allegations of paragraph Two Hundred and Twenty-One of the Complaint.

222. Defendant denies the allegations of paragraph Two Hundred and Twenty-Two of the Complaint.

223. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Twenty-Three of the Complaint.

224. Defendant denies the allegations of paragraph Two Hundred and Twenty-Four of the Complaint.

225. Defendant denies the allegations of paragraph Two Hundred and Twenty-Five of the Complaint.

226. Defendant denies the allegations of paragraph Two Hundred and Twenty-Six of the Complaint.

227. Defendant denies the allegations of paragraph Two Hundred and Twenty-Seven of the Complaint.

228. Defendant denies the allegations of paragraph Two Hundred and Twenty-Eight of the Complaint.

229. Defendant denies the allegations of paragraph Two Hundred and Twenty-Nine of the Complaint.

230. Defendant denies the allegations of paragraph Two Hundred and Thirty of the Complaint.

231. Defendant denies the allegations of paragraph Two Hundred and Thirty-One of the Complaint.

232. Defendant denies the allegations of paragraph Two Hundred and Thirty-Two of the Complaint.

233. Defendant denies the allegations of paragraph Two Hundred and Thirty-Three of the Complaint.

234. Defendant denies the allegations of paragraph Two Hundred and Thirty-Four of the Complaint.

235. Defendant denies the allegations of paragraph Two Hundred and Thirty-Five of the Complaint.

236. Defendant denies the allegations of paragraph Two Hundred and Thirty-Six of the Complaint.

237. Defendant denies the allegations of paragraph Two Hundred and Thirty-Seven of the Complaint.

238. Defendant denies the allegations of paragraph Two Hundred and Thirty-Eight of the Complaint.

239. Defendant denies the allegations of paragraph Two Hundred and Thirty-Nine of the Complaint.

240. Defendant denies the allegations of paragraph Two Hundred and Forty of the Complaint.

241. Defendant denies the allegations of paragraph Two Hundred and Forty-One of the Complaint.



242. Defendant denies the allegations of paragraph Two Hundred and Forty-Two of the Complaint.

243. Defendant denies the allegations of paragraph Two Hundred and Forty-Three of the Complaint.

244. Defendant denies the allegations of paragraph Two Hundred and Forty-Four of the Complaint.

245. Defendant denies the allegations of paragraph Two Hundred and Forty-Five of the Complaint.

246. Defendant denies the allegations of paragraph Two Hundred and Forty-Six of the Complaint.

247. Defendant denies the allegations of paragraph Two Hundred and Forty-Seven of the Complaint.

248. Defendant denies the allegations of paragraph Two Hundred and Forty-Eight of the Complaint.

249. Defendant denies the allegations of paragraph Two Hundred and Forty-Nine of the Complaint.

250. Defendant denies the allegations of paragraph Two Hundred and Fifty of the Complaint.

251. Defendant denies the allegations of paragraph Two Hundred and Fifty-One of the Complaint.

252. Defendant denies the allegations of paragraph Two Hundred and Fifty-Two of the Complaint.

253. Defendant denies the allegations of paragraph Two Hundred and Fifty-Three of the Complaint.

254. Defendant denies the allegations of paragraph Two Hundred and Fifty-Four of the Complaint.

255. Defendant denies the allegations of paragraph Two Hundred and Fifty-Five of the Complaint.

256. Defendant denies the allegations of paragraph Two Hundred and Fifty-Six of the Complaint.

257. Defendant denies the allegations of paragraph Two Hundred and Fifty-Seven of the Complaint.

258. Defendant denies the allegations of paragraph Two Hundred and Fifty-Eight of the Complaint.

259. Defendant denies the allegations of paragraph Two Hundred and Fifty-Nine of the Complaint.

260. Defendant denies the allegations of paragraph Two Hundred and Sixty of the Complaint.

261. Defendant denies the allegations of paragraph Two Hundred and Sixty-One of the Complaint.

262. Defendant denies the allegations of paragraph Two Hundred and Sixty-Two of the Complaint.

263. Defendant denies the allegations of paragraph Two Hundred and Sixty-Three of the Complaint.

264. Defendant denies the allegations of paragraph Two Hundred and Sixty-Four of the Complaint.

265. Defendant denies the allegations of paragraph Two Hundred and Sixty-Five of the Complaint.

266. Defendant denies the allegations of paragraph Two Hundred and Sixty-Six of the Complaint.

267. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Sixty-Seven of the Complaint.

268. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Sixty-Eight of the Complaint.

269. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Sixty-Nine of the Complaint.

270. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy of the Complaint.

271. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-One of the Complaint.

272. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Two of the Complaint.

273. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Three of the Complaint.

274. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Four of the Complaint.

275. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Five of the Complaint.

276. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Six of the Complaint.

277. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Seven of the Complaint.

278. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Eight of the Complaint.

279. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Seventy-Nine of the Complaint.

280. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty of the Complaint.

281. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-One of the Complaint.

282. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Two of the Complaint.

283. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Three of the Complaint.

284. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Four of the Complaint.

285. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Five of the Complaint.



286. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Six of the Complaint.

287. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Seven of the Complaint.

288. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Eight of the Complaint.

289. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Eighty-Nine of the Complaint.

290. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety of the Complaint.

291. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-One of the Complaint.

292. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-Two of the Complaint.

293. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-Three of the Complaint.

294. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-Four of the Complaint.

295. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-Five of the Complaint.

296. Defendant denies the allegations of paragraph Two Hundred and Ninety-Six of the Complaint.



297. Defendant denies the allegations of paragraph Two Hundred and Ninety-Seven of the Complaint.

298. Defendant denies the allegations of paragraph Two Hundred and Ninety-Eight of the Complaint.

299. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Two Hundred and Ninety-Nine of the Complaint.

300. Defendant denies the allegations of paragraph Three Hundred of the Complaint.

301. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and One of the Complaint.

302. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Two of the Complaint.

303. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Three of the Complaint.

304. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Four of the Complaint.

305. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Five of the Complaint.

306. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Six of the Complaint.

307. Defendant denies the allegations of paragraph Three Hundred and Seven of the Complaint.

308. Defendant denies the allegations of paragraph Three Hundred and Eight of the Complaint.

309. Defendant denies the allegations of paragraph Three Hundred and Nine of the Complaint.

310. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Ten of the Complaint.

311. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Eleven of the Complaint.

312. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Twelve of the Complaint.

313. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Thirteen of the Complaint.

314. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Fourteen of the Complaint.

315. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Fifteen of the Complaint.

316. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Sixteen of the Complaint.

317. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Seventeen of the Complaint.

318. Defendant denies the allegations of paragraph Three Hundred and Eighteen of the Complaint.

319. Defendant denies the allegations of paragraph Three Hundred and Nineteen of the Complaint.

**AS TO VIOLATIONS AND CLAIM ALLEGED**  
**COUNT 1**

**GENDER DISCRIMINATION  
IN VIOLATION OF  
TITLE VII OF THE CIVIL RIGHT ACT OF 1964**

320. Defendant denies the allegations of paragraph Three Hundred and Twenty of the Complaint.

321. Defendant denies the allegations of paragraph Three Hundred and Twenty-One of the Complaint.

322. Defendant denies the allegations of paragraph Three Hundred and Twenty-Two of the Complaint.

323. Defendant denies the allegations of paragraph Three Hundred and Twenty-Three of the Complaint.

324. Defendant denies the allegations of paragraph Three Hundred and Twenty-Four of the Complaint.

325. Defendant denies the allegations of paragraph Three Hundred and Twenty-Five of the Complaint.

**AS TO COUNT 11  
HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF  
TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

326. Defendant denies the allegations of paragraph Three Hundred and Twenty-Six of the Complaint.

327. Defendant denies the allegations of paragraph Three Hundred and Twenty-Seven of the Complaint.

328. Defendant denies the allegations of paragraph Three Hundred and Twenty-Eight of the Complaint.

**AS TO COUNT III**

**GENDER DISCRIMINATION  
IN VIOLATION OF  
THE CIVIL RIGHT ACT OF 1971, 42 U.S.C. §1983**

329. Defendant denies the allegations of paragraph Three Hundred and Twenty-Nine of the Complaint.

330. Defendant denies the allegations of paragraph Three Hundred and Thirty of the Complaint.

331. Defendant denies the allegations of paragraph Three Hundred and Thirty-One of the Complaint.

**AS TO COUNT IV  
HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

332. Defendant denies the allegations of paragraph Three Hundred and Thirty-Two of the Complaint.

333. Defendant denies the allegations of paragraph Three Hundred and Thirty-Three of the Complaint.

334. Defendant denies the allegations of paragraph Three Hundred and Thirty-Four of the Complaint.

**AS TO COUNT V  
MONELL CLAIM  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

335. Defendant denies the allegations of paragraph Three Hundred and Thirty-Five of the Complaint.

336. Defendant denies the allegations of paragraph Three Hundred and Thirty-Six of the Complaint.



337. Defendant denies the allegations of paragraph Three Hundred and Thirty-Seven of the Complaint.

338. Defendant denies the allegations of paragraph Three Hundred and Thirty-Eight of the Complaint.

339. Defendant denies the allegations of paragraph Three Hundred and Thirty-Nine of the Complaint.

340. Defendant denies the allegations of paragraph Three Hundred and Forty of the Complaint.

**AS TO COUNTY VI  
NEGLIGENT HIRING  
IN VIOLATION OF  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

341. Defendant denies the allegations of paragraph Three Hundred and Forty-One of the Complaint.

342. Defendant denies the allegations of paragraph Three Hundred and Forty-Two of the Complaint.

343. Defendant denies the allegations of paragraph Three Hundred and Forty-Three of the Complaint.

344. Defendant denies the allegations of paragraph Three Hundred and Forty-Four of the Complaint.

**AS TO COUNTY VII  
FAILURE TO TRAIN  
IN VIOLATION OF  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

345. Defendant denies the allegations of paragraph Three Hundred and Forty-Five of the Complaint.



346. Defendant denies the allegations of paragraph Three Hundred and Forty-Six of the Complaint.

347. Defendant denies the allegations of paragraph Three Hundred and Forty-Seven of the Complaint.

348. Defendant denies the allegations of paragraph Three Hundred and Forty-Eight of the Complaint.

349. Defendant denies the allegations of paragraph Three Hundred and Forty-Nine of the Complaint.

**AS TO COUNT VIII  
FAILURE TO SUPERVISE  
IN VIOLATION OF  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

350. Defendant denies the allegations of paragraph Three Hundred and Fifty of the Complaint.

351. Defendant denies the allegations of paragraph Three Hundred and Fifty-One of the Complaint.

352. Defendant denies the allegations of paragraph Three Hundred and Fifty-Two of the Complaint.

353. Defendant denies the allegations of paragraph Three Hundred and Fifty-Three of the Complaint.

354. Defendant denies the allegations of paragraph Three Hundred and Fifty-Four of the Complaint.

**AS TO COUNT IX  
FAILURE TO DISCIPLINE  
IN VIOLATION OF  
THE CIVIL RIGHTS ACT OF 1871, 42 U.S.C. §1983**

355. Defendant denies the allegations of paragraph Three Hundred and Fifty-Five of the Complaint.

356. Defendant denies the allegations of paragraph Three Hundred and Fifty-Six of the Complaint.

357. Defendant denies the allegations of paragraph Three Hundred and Fifty-Seven of the Complaint.

358. Defendant denies the allegations of paragraph Three Hundred and Fifty-Eight of the Complaint.

**AS TO COUNT X  
GENDER DISCRIMINATION  
IN VIOLATION OF  
NEW YORK STATE EXECUTIVE LAW §296**

359. Defendant denies the allegations of paragraph Three Hundred and Fifty-Nine of the Complaint.

360. Defendant denies the allegations of paragraph Three Hundred and Sixty of the Complaint.

361. Defendant denies the allegations of paragraph Three Hundred and Sixty-One of the Complaint.

362. Defendant denies the allegations of paragraph Three Hundred and Sixty-Two of the Complaint.

363. Defendant denies the allegations of paragraph Three Hundred and Sixty-Three of the Complaint.

**AS TO COUNT XI  
HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF**

**NEW YORK STATE EXECUTIVE LAW §296**

364. Defendant denies the allegations of paragraph Three Hundred and Sixty-Four of the Complaint.

365. Defendant denies the allegations of paragraph Three Hundred and Sixty-Five of the Complaint.

366. Defendant denies the allegations of paragraph Three Hundred and Sixty-Six of the Complaint.

367. Defendant denies the allegations of paragraph Three Hundred and Sixty-Seven of the Complaint.

368. Defendant denies the allegations of paragraph Three Hundred and Sixty-Eight of the Complaint.

369. Defendant denies the allegations of paragraph Three Hundred and Sixty-Nine of the Complaint.

**AS TO COUNT XII  
GENDER DISCRIMINATION  
IN VIOLATION OF  
NEW YORK CITY ADMINISTRATIVE CODE §8-107**

370. Defendant denies the allegations of paragraph Three Hundred and Seventy of the Complaint.

371. Defendant denies the allegations of paragraph Three Hundred and Seventy-One of the Complaint.

372. Defendant denies the allegations of paragraph Three Hundred and Seventy-Two of the Complaint.

373. Defendant denies the allegations of paragraph Three Hundred and Seventy-Three of the Complaint.

374. Defendant denies the allegations of paragraph Three Hundred and Seventy-Four of the Complaint.

**AS TO COUNT XIII  
HOSTILE WORK ENVIRONMENT  
IN VIOLATION OF  
NEW YORK STATE EXECUTIVE LAW §296**

375. Defendant denies the allegations of paragraph Three Hundred and Seventy-Five of the Complaint.

376. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Seventy-Six of the Complaint;  
Refers all questions of Law to Court

377. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Seventy-Seven of the Complaint.

378. Defendant denies the allegations of paragraph Three Hundred and Seventy-Eight of the Complaint.

379. Defendant denies the allegations of paragraph Three Hundred and Seventy-Nine of the Complaint.

380. Defendant denies the allegations of paragraph Three Hundred and Eighty of the Complaint.

**AS TO COUNT XIV  
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

381. Defendant denies the allegations of paragraph Three Hundred and Eighty-One of the Complaint.

382. Defendant denies the allegations of paragraph Three Hundred and Eighty-Two of the Complaint.

383. Defendant denies the allegations of paragraph Three Hundred and Eighty-Three of the Complaint.

384. Defendant denies the allegations of paragraph Three Hundred and Eighty-Four of the Complaint.

**AS TO COUNT XV  
DEFAMATION and LIBEL PER SE**

385. Defendant denies the allegations of paragraph Three Hundred and Eighty-Five of the Complaint.

386. Defendant denies the allegations of paragraph Three Hundred and Eighty-Six of the Complaint.

387. Defendant denies the allegations of paragraph Three Hundred and Eighty-Seven of the Complaint.

388. Defendant denies the allegations of paragraph Three Hundred and Eighty-Eight of the Complaint.

389. Defendant denies the allegations of paragraph Three Hundred and Eighty-Nine of the Complaint.

390. Defendant denies the allegations of paragraph Three Hundred and Ninety of the Complaint.

391. Defendant denies the allegations of paragraph Three Hundred and Ninety-One of the Complaint.



**AS TO COUNT XVI  
ASSAULT**

392. Defendant denies the allegations of paragraph Three Hundred and Ninety-Two of the Complaint.

393. Defendant denies the allegations of paragraph Three Hundred and Ninety-Three of the Complaint.

394. Defendant denies the allegations of paragraph Three Hundred and Ninety-Four of the Complaint.

395. Defendant denies the allegations of paragraph Three Hundred and Ninety-Five of the Complaint.

396. Defendant denies the allegations of paragraph Three Hundred and Ninety-Six of the Complaint.

**AS TO JURY TRIAL**

397. Defendant denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of paragraph Three Hundred and Ninety-Seven of the Complaint.

**AS TO PRAYER FOR RELIEF**

398. Defendant denies the allegations of paragraph Three Hundred and Ninety-Seven of the Complaint.

**AFFIRMATIVE DEFENSES**

**First Affirmative Defense**

399. The Complaint fails to state a claim upon which relief can be granted and/or portions of the Complaint fail to state a claim upon which relief may be granted.

**Second Affirmative Defense**

400. The allegations in whole or in part are barred by the applicable statute of limitations.

**Third Affirmative Defense**

401. The conduct complained of even in the light most favorable to the plaintiff is insufficient to create hostile work environment as defined by Title VII and applicable State law.

**Fourth Affirmative Defense**

402. The conduct complained of even in the light most favorable to the plaintiff fails to constitute conduct severe and pervasive as defined by Title VII and applicable State law

**Fifth Affirmative Defense**

403. The allegations to the extent they exceed the conduct complained of in the Administrative charge filed with the EEOC are barred and properly dismissed.

**Sixth Affirmative Defense**

404. The defendants upon being provided with written notice of the alleged conduct by the plaintiff took reasonable steps to remedy the alleged harassment/discrimination.

**Seventh Affirmative Defense**

405. The plaintiff's damages, if any proven, at trial, should be reduced based on her failure to mitigate the same.

**Eighth Affirmative Defense**

406. The plaintiff has waived her right to a jury trial based upon her request for equitable relief.

**Ninth Affirmative Defense**

407. Defendants hereby gives notice that it intends to rely upon such other affirmative defense as may become apparent during the course of discovery and thus reserves the right to amend this answer to assert any such defenses.

**Tenth Affirmative Defense**

408. A verdict in favor of Plaintiff, if any, shall be reduced by the value of any benefits received by Plaintiff, paid on Plaintiff's behalf, or available to Plaintiff from any collateral source.

**Eleventh Affirmative Defense**

409. Pursuant to CPLR Article 16, the liability, if any, of the defendants for non-economic loss shall not exceed its equitable share of liability.

**Sixteenth Affirmative Defense**

410. Should Plaintiff recover damages from the defendants named herein, then the defendants herein are entitled to contribution, set-off, and/or indemnification, either in whole or in part, from all persons or entities whose negligence, fault or other culpable conduct proximately contributed to Plaintiff's injuries, if any.

**Twelfth Affirmative Defense**

411. Plaintiff's claims are or may be barred in whole or in part to the extent that Plaintiff has released, settled, entered into an accord and satisfaction, or otherwise compromised those claims.

**AS AND FOR COUNTER CLAIMS AGAINST THE  
PLAINTIFF TABITHA FOSTER**

JEFFREY B. MADDREY, by and through his undersigned attorneys, alleges as and for, his counter claims against the plaintiff, TABATHA FOSTER, upon knowledge as to his own acts, the behavior of the plaintiff as well as upon information and belief as to all other matters as follows:

**BACKGROUND FACTS**

412. That for all relevant periods alleged in the complaint, the plaintiff, TABATHA FOSTER, engaged in reprehensible, vindictive and behavior which shocks the conscious towards the defendant JEFFREY B. MADDREY.

413. That the behavior of TABATHA FOSTER, was calculating and vindictive and an attempt to ruin the career of the defendant, JEFFREY B. MADDREY and, that on various occasions during the relevant period in the complaint, the plaintiff, TABATHA FOSTER, did send harassing, mean spirited and threatening communications to the defendant, JEFFREY B. MADDREY.

414. That starting in 2011 and continuing thru 2016, the defendant, TABATHA FOSTER, sent communications threatening to kill defendant, JEFFREY B. MADDREY, threatening to kill his family and threatening to "shoot up a party" that the defendant, JEFFREY B. MADDREY, was going to attend.

415. That the plaintiff, TABATHA FOSTER, held in her hands a loaded weapon while in the presence of defendant, JEFFREY B. MADDREY, and threatened to kill him and went on to physically assault him without provocation.

416. That on various occasions between 2011 and 2016, plaintiff TABATHA FOSTER, posted false, misleading, defamatory, slanderous and libelous material on various social media setting forth false accusations against the defendant, JEFFREY B. MADDREY.

**AS AND FOR FIRST COUNTER CLAIM  
AGAINST PLAINTIFF TABATHA FOSTER  
(DEFAMATION AND LIABLE PER SE)**

417. JEFFREY B. MADDREY, repeats reiterates and realleges, each and every preceding paragraph with the same force and effect as if set forth herein.

418. Defendant alleges that the plaintiff, TABATHA FOSTER, either published or caused to be published, defamatory statements about him.

419. Defendant alleges these defamatory statements include “false assertions” that he engaged in a harassing, inappropriate and unprofessional manner.

420. Defendant alleges the defamatory statements as “false” and plaintiff, TABATHA FOSTER, was aware but “maliciously” chose to publish or cause to be published, such defamatory statements anyway.

421. Defendant alleges plaintiff, TABATHA FOSTER, defamatory statements constitute defamation constitute defamation and/or liable *per se* because they impugn on him honesty, trustworthiness, and dependability, his personal and professional reputation.

422. Defendant, TABATHA FOSTER’S, actions damaged his reputation in the law enforcement community and communities at large.



423. Defendant, TABATHA FOSTER'S, defamatory statements have caused him to incur significant legal costs, emotional distress, and irreparable damage to her personal and professional reputation.

**AS AND FOR SECOND COUNTER CLAIM  
AGAINST PLAINTIFF TABATHA FOSTER  
(ASSAULT)**

424. JEFFREY B. MADDREY, repeats reiterates and realleges, each and every preceding paragraph with the same force and effect as if set forth herein.

425. Under the common law of Torts, makes it unlawful for a plaintiff to intend to place a defendant in imminent fear of a harmful and offensive touching.

426. Defendant alleges plaintiff, TABATHA FOSTER, by her extreme and outrageous conduct intended to place defendant in imminent fear of a harmful and offensive touching.

427. Based on the forgoing, Plaintiff TABATHA FOSTER'S, extreme and outrageous conduct caused defendant to be in imminent fear of a harmful and offensive touching.

428. As a direct and proximate result of Plaintiff, TABATHA FOSTER'S, actions, defendant JEFFREY B. MADDREY, has suffered the indignity of great humiliation.

**JURY TRIAL**

429. Defendant demands a trial by jury of all issues alleged in the counterclaims in this action that are so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Defendant, JEFFREY B. MADDREY, demands compensatory and punitive damages from plaintiff, TABATHA FOSTER, for \$2 Million Dollars, plus available statutory remedies, both legal and equitable, interests and costs.

Dated: April 10, 2017  
New York, NY

THE LAMBROU LAW FIRM, P.C.

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New York, New York 10006

(212) 285-2100

(212) 285-2110

By: 

Lambros Y. Lambrou (LL - 6462)

For Defendant JEFFREY B. MADDREY